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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	06 CV 2469 (HB) (AJP)
THE EXPORT-IMPORT BANK OF	:	
THE REPUBLIC OF CHINA,	:	
	:	
Plaintiff/Judgment Creditor,	:	
	:	SAMUELS DECLARATION
-against-	:	IN SUPPORT OF
	:	PLAINTIFF'S MOTION TO
GRENADA,	:	COMPEL POST-JUDGMENT
	:	INTERROGATORIES
Defendant/Judgment Debtor.	:	
-----X	:	

Emily A. Samuels, pursuant to 28 U.S.C. § 1746, declares:

1. I am an associate at the firm of Sullivan & Worcester LLP, attorneys for plaintiff, The Export-Import Bank of the Republic of China ("Ex-Im Bank"). I submit this Declaration in support of Plaintiff's Motion to Compel defendant Grenada's ("Grenada") response to Ex-Im Bank's Post-Judgment Interrogatories.
2. On March 29, 2006, Ex-Im Bank commenced a lawsuit against Grenada seeking to enforce its rights under four loan agreements. Copies of the loan agreements (without exhibits) are attached hereto as Exhibit A.

3. On March 16, 2007, the Court entered an amended judgment granting Ex-Im Bank summary judgment. A copy of the Amended Judgment is attached hereto as Exhibit B.

4. Subsequent to entry of judgment, Ex-Im Bank attempted to work with Grenada, through its counsel, Donzell Tucker, Esq. ("Ms. Tucker") to reach an amicable payment plan. The negotiations were not successful and, to date, Grenada has made no payments.

5. On October 3, 2007, Ex-Im Bank served Post-Judgment Interrogatories (the "Interrogatories") on Grenada, by FedEx and email to Ms. Tucker. A copy of the Post-Judgment Interrogatories is attached hereto as Exhibit C.

6. On October 9, 2007, Ex-Im Bank served a copy of the Interrogatories, by Certified Mail, Return Receipt Requested, upon the Ambassador for Grenada, the Consul General of Grenada, and the Minister of Finance of Grenada. A copy of the Samuels Affirmation of Service is attached hereto as Exhibit D.

7. On October 26, 2007, Ex-Im Bank served a copy of the Interrogatories by personal service, upon CT Corporation, Grenada's agent for service of process under the loan agreements. A copy of the Lombardo Affidavit of Service is attached hereto as Exhibit E.

8. Ex-Im Bank attempted to contact Ms. Tucker to discuss the interrogatories, but, Ms. Tucker did not return the calls.

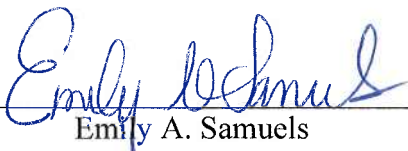
9. On February 11, 2008, Ex-Im Bank sent Ms. Tucker a letter seeking Grenada's compliance with the Interrogatories. A copy of the letter is attached hereto as Exhibit F.

10. Despite Ex-Im Bank's efforts to obtain Grenada's voluntary compliance, Grenada has not answered, responded, or otherwise objected to the Interrogatories.

11. The undersigned certifies that Sullivan & Worcester LLP has, in good faith, attempted to confer with Grenada's attorney in an unsuccessful effort to secure the requested information without court action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: New York, New York
March 20, 2008


Emily A. Samuels